

January 17, 2011

The Honorable Julius Genachowski
Chairman, Federal Communication Commission
Room 8-B201
445 12th Street, SW
Washington, DC 20554

Subject: FCC File No. SAT-Mod-20101118-00239, LightSquared Subsidiary LLC Request for Modification of Its Authority for an Ancillary Terrestrial Component

Dear Mr. Genachowski:

We are deeply concerned that the proposal by LightSquared referenced above will interfere with GPS receiver operation. It is imperative that the GPS national utility remain free of impediments to operation for more than 75 million North American GPS users.

This is not simply a "turf war" over spectrum allocation. It is a public safety issue that would threaten the national transportation grid, national financial system, national security, and virtually everyone in the United States.

The LightSquared proposal will result in an unreliable GPS signal reception with the following effects:

- Inability of emergency responders to effectively answer calls
- Loss of pilots' primary means of navigation during a final approach
- Disruption of training exercises for military service members who routinely use commercial GPS systems
- Loss of the precise timing provided by GPS which is essential for operation of the financial system, power grid network synchronization, and cellular telephone system synchronization and cost accounting

Furthermore, the U.S. GPS constellation is currently undergoing an \$8 billion upgrade. Approval of the LightSquared proposal without adequate testing will result in a poor return on this huge taxpayer investment.

We urge the FCC to conduct technical interference analysis BEFORE granting a waiver to effectively allow a reallocation of spectrum use from mobile satellite space service to terrestrial wireless service that is adjacent to the band where GPS operates. Further, we urge the FCC to consider this request from LightSquared under the Notice of Proposed Rule-Making process initiated in ET Docket No. 10-142 to ensure adequate opportunity for public comment.

Very truly yours,

David Stahl
Sales Manager
PAVCO Aircraft

cc: Commissioner Michael J. Copps
Commissioner Robert M. McDowell
Commissioner Mignon L. Clyburn
Commissioner Meredith A. Baker